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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
RYAN A. BALTOIANO, )  
IVONNE M. GUERRERO, and )  
ULISES E. SANTOS, )  
 )  
Defendant. )

Case No. CR 07-0692 MAG

**DECLARATION OF DANIELLE  
CROCKETT IN SUPPORT OF UNITED  
STATES' MOTION FOR SUMMONS**

I, Danielle Crockett, hereby declare as follows:

1. I am a Law Clerk in the United States Attorney's Office assigned to the prosecution of this case. I have received the following information from officers employed by the United States Park Police, and from reports and other documents provided to me by the officers of the United States Park Police.

2. On September 11, 2007, Presidio Trust employees walked into 951 Lincoln Boulevard, heard people inside, smelled spray paint throughout the main hallway, and observed wet paint on the wall. They observed four individuals exit the building across Lincoln Boulevard and enter the wooded area above Long Avenue. The Trust employees called the United States Park Police,

1 who dispatched Officer Whalen, Sergeant Hart, and Lieutenant Wasserman to the scene.

2 3. Upon Officer Whalen's arrival, the Trust employees directed Officer Whalen to two  
3 suspects, a Hispanic male adult later identified as Ulises Santos, and a black male juvenile,  
4 hiding in the tree line at Long Avenue. Officer Whalen told the suspects to approach him.  
5 Instead, the two suspects fled on foot along Long Avenue. Officer Whalen followed the suspects  
6 in his vehicle. The suspects were apprehended when Lieutenant Wasserman arrived in a Park  
7 Police vehicle and prevented the suspects from escaping. The Trust employees identified Ulises  
8 Santos as one of the individuals that they saw flee from 951 Lincoln Boulevard.

9 4. Upon Sergeant Hart's arrival, he observed a Hispanic male, later identified as Ryan  
10 Baltodano, walking along the scenic trail northwest of 951 Lincoln Boulevard. Mr. Baltodano  
11 was breathing heavily and stopped when he made eye contact with Sergeant Hart. Sergeant Hart  
12 stopped Mr. Baltodano and detained him for further investigation. During that time, a Trust  
13 employee identified Mr. Baltodano as one of the suspects he saw flee 951 Lincoln Boulevard. In  
14 addition, Ivonne Guerrero stated that Mr. Baltodano was with her in 951 Lincoln Boulevard. At  
15 that time, Mr. Baltodano admitted to spray painting the interior of 951 Lincoln Boulevard.

16 5. Upon Lieutenant Wasserman's arrival, a female, identified as Ivonne Guerrero,  
17 approached him. Ms. Guerrero informed Lieutenant Wasserman that she needed to recover her  
18 backpack and keys from 951 Lincoln Boulevard. Lieutenant Wasserman asked Ms. Guerrero if  
19 she participated in the vandalism of the building. In response, Ms. Guerrero stated that she had  
20 been inside the building photographing the graffiti, and that she had not participated in the  
21 vandalism. Lieutenant Wasserman asked her if Mr. Baltodano had been in the building with her,

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1 and she stated that he was.

2 6. I declare under penalty of perjury that the foregoing is true and correct to the best of my  
3 knowledge and belief. Executed November 16, 2007, at San Francisco, California.

4  
5 DATED: 11/16/2007

Respectfully submitted,

6 SCOTT N. SCHOOLS  
7 United States Attorney

8 /s/  
9 DANIELLE CROCKETT  
10 Law Clerk  
11 United States Attorney's Office  
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